

Before the
POSTAL REGULATORY COMMISSION
WASHINGTON, DC 20268-0001

Periodic Reporting
(Proposal Thirteen)

Docket No. RM2015-7

MOTION FOR EXTENSION OF TIME TO FILE COMMENTS

(March 9, 2015.)

Pursuant to Rule 21, 39 C.F.R. 3001.21, the Public Representative hereby moves the Commission for an extension of time for one week until March 18, 2015 for all interested persons to file initial Comments in this proceeding. The requested extension of time will not prejudice the interests of any of person interested in this proceeding.

Commission Order No. 2294 established this proceeding and provided that comments on the Postal Service's Proposal Thirteen are due no later than March 11, 2015.¹ This proceeding involves the Postal Service's proposal to change analytical principles relating to periodic reports to update the City Carrier Street Time Model. *Id* at 1. The Postal Service's broad new cost study updates and refines three main components of the city carrier cost model: construction of the cost pools, estimation of regular delivery variabilities and estimation of package and accountable delivery variabilities.

Careful analysis is required of the cost model, including the data filed with the petition, the additional information filed pursuant to the Chairman's Information Requests and the additional DOIS Data filed by the Postal Service as a library reference (USPS-RM2015-7/2) on March 2, 2015 in response to an informal request. Unanticipated additional assignments in ongoing Commission dockets requiring the

¹ Notice and Order on Petition for Rulemaking (Proposal Thirteen), December 18, 2014 (Order No. 2294)..

immediate attention of the Public Representative, coupled with the recent unusual winter weather late last week that closed the federal government for one day on Thursday, March 5, and delayed its opening on Friday, March 6, have necessitated this motion for a one week extension of time to March 18, 2015 to file Comments. In order to avoid any potential prejudice to any other participant, the Public Representative requests the date for filing comments be extended for all initial Comments to March 18, 2015..

The Public Representative is not requesting in this motion an extension of the April 8, 2015 date established by Order No.2294 for reply comments.

Respectfully submitted,

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